

## STATEMENT OF BASIS (AI No. 141718)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122513 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Blue Flash Express, LLC  
23356 Old Scenic Highway  
Zachary, LA 70791

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Molly Hebert

### DATE PREPARED:

#### 1. PERMIT STATUS

##### A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A  
NPDES permit expiration date: N/A  
EPA has not retained enforcement authority.

C. LPDES permits - LPDES permit effective date: N/A  
LPDES permit expiration date: N/A

D. Date Application Received: October 19, 2006

#### 2. FACILITY INFORMATION

##### A. FACILITY TYPE/ACTIVITY - trucking terminal

Blue Flash Express, LLC transports food grade plastic pellets and food grade salt products for various manufacturers. The facility does not produce, manufacture, or use any products that are transported. All products are transported in sealed dry bulk and liquid trailers. Truck interiors are washed in a covered, bermed truck bay. Rinse water from truck interiors is screened for solids, then routed to a series of settling tanks prior to discharge. Solids are removed twice per year by Safety Kleen. Exterior washes using Super Power Plus (soaps) and Rudy's Acid Wash (aluminum cleaners) are also conducted. Exterior vehicle wash is treated as described above. Treated sanitary wastewater is discharged through outfall 002.

Per LAC33.IX.2511.B.14.h, for transportation facilities classified as SIC Code 4212, only stormwater from those portions of the facility involved in vehicle maintenance, equipment cleaning operations are defined as stormwater associated with industrial activity. The vehicle washing operation at Blue Flash Express, LLC is all under roof and bermed. Additionally, the facility submitted a No Exposure Certification on December 13, 2006. Therefore, stormwater from this facility is not classified as stormwater associated with industrial activity and shall not be regulated in this LPDES permit.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4212, 7542

**C. LOCATION** - 989 Thomas Road, Baton Rouge, East Baton Rouge Parish  
Latitude 30 33' 13", Longitude 91 11' 09"

**3. OUTFALL INFORMATION**

Outfall 001

Discharge Type: interior and exterior tank truck washwater  
Treatment: screening and solids settling tanks  
Location: at the point of discharge from the pipe of the final sediment tank, located on the southwest side of the property along Thomas Road, prior to mixing with any other waters  
Flow: 2500 GPD  
Discharge Route: to Baton Rouge Harbor via local drainage, thence into the Mississippi River

Outfall 002

Discharge Type: sanitary wastewater  
Treatment: mechanical treatment plant with aeration and chlorination  
Location: at the point of discharge from the sewage treatment plant, located on the southeast side of the property along Thomas Road, prior to mixing with any other waters  
Flow: 750 GPD  
Discharge Route: to Baton Rouge Harbor via local drainage, thence into the Mississippi River

**4. RECEIVING WATERS**

STREAM - to Baton Rouge Harbor via local drainage, thence into the Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070504

DESIGNATED USES - b. secondary contact recreation  
1. limited aquatic life and wildlife use

**5. TMDL STATUS**

Subsegment 070504, Baton Rouge Harbor via local drainage, thence into the Mississippi River, is listed on LDEQ's Final 2004 303(d) List as impaired for chlorine. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were eliminated. While this facility does use chlorination as part of the treatment for sanitary wastewater, the magnitude of the discharge (0.00075 MGD) is so small that it is not expected to cause, have the reasonable potential to cause, or contribute to further impairment of the receiving stream.

**6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

**7. COMPLIANCE HISTORY/COMMENTS**

1. WQMD – This is a new facility. As of December 1, 2006, there are no inspections or enforcement actions on file.
2. DMR Review/Excursions – This is a new facility. As of December 1, 2006, there are no DMRs on file.

**8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 070504 of the Mississippi River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

**9. HISTORIC SITES**

The discharge will be from a proposed facility (expansion). LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated October 23, 2006 to determine whether construction-related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response letter, dated November 28, 2006, stated that the facility as proposed will have no potential effects.

**10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

**11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

### Rationale for Blue Flash Express, LLC

#### 1. Outfall 001 - interior and exterior tank truck washwater (estimated flow is 2500 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report : Report	LAC33.IX.2707.I.1.b
BOD <sub>5</sub>	24 : 56	40 CFR 442.44
TSS	86 : 230	40 CFR 442.44
Oil and Grease	8.8 : 20	40 CFR 442.44
Soaps and Detergents	Report : Report	BPJ; LAG670000
pH	6.0 su – 9.0 su (min) (max)	40 CFR 442.44

**Treatment:** screening and solids settling

**Monitoring Frequency:** quarterly for Soaps and Detergents; monthly for all other parameters

**Limits Justification:** This facility is subject to New Source Performance Standards for Transportation Equipment Cleaning (TEC) wastewater located in 40 CFR 442.44. The facility discharges greater than 100,000 gallons per year of TEC wastewater from cleaning tank trucks transporting food grade cargos.

su Standard Units

#### 2. Outfall 002 – sanitary wastewater (estimated flow is 750 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg (mg/l)	<u>Reference</u>
Flow	--- : Report	LAC33.IX.2707.I.1.b
BOD <sub>5</sub>	--- : 45	LAG530000
TSS	--- : 45	LAG530000
Fecal Coliform Colonies/100 ml	--- : 400	LAG530000
pH	6.0 su – 9.0 su (min) (max)	LAG530000

**Treatment:** package treatment plant with aeration and chlorination

**Monitoring Frequency:** semianually

**Limits Justification:** These limits are based on Schedule B of the Class I Sanitary General Permit, LAG530000.

### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 4212 are not considered to be associated with industrial activities. Therefore an SWP3 is not included in the permit

Appendix A  
Commodities List

Food Grade Plastic Pellets  
Food Grade Salt Products